EXHIBIT 9

From: Judd Burstein

Sent: Friday, January 28, 2022 11:59 AM

To:Steven GordonSubject:Possible resolution

Steven:; I am prepared to send you a proposal to avoid a sanctions motion against you which I believe would be workable. But I want to make sure we agree that it is entirely confidential and that if we cannot agree, it will not be disclosed for any purpose whatsoever.

Judd Burstein
Judd Burstein, P.C.
260 Madison Avenue
15th Floor
New York, New York 10016
(212) 974-2400
(212) 974-2944 (Fax)

MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER – PARTICULARLY WHEN I AM DRAFTING AN EMAIL UNDER TIME PRESSURE

From: Steven Gordon <sg@nytlaw.com>
Sent: Steven Gordon <sg@nytlaw.com>
Friday, January 28, 2022 12:15 PM

To: Judd Burstein

Subject: Re: Possible resolution

Ok, Judd. Yes, I agree it will be confidential.

On Fri, Jan 28, 2022 at 11:59 AM Judd Burstein < jburstein@burlaw.com> wrote:

Steven:; I am prepared to send you a proposal to avoid a sanctions motion against you which I believe would be workable. But I want to make sure we agree that it is entirely confidential and that if we cannot agree, it will not be disclosed for any purpose whatsoever.

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Steven N. Gordon, Esq. Tsyngauz & Associates, P.C. 114 Mulberry Street, Ground Floor New York, NY 10013

Telephone: (212) 337-9770 Facsimile: (212) 337-3375 Email: sg@nytlaw.com

From: Judd Burstein

Sent: Friday, January 28, 2022 1:06 PM

To: Steven Gordon

Subject: FOR SETTLEMENT PURPOSES ONLY

Steven:

I think this is fair. I am not asking you to say anything that you would not say in response to my sanctions motion. Nor am I asking you to agree that my email about your wife was appropriate because I understand how you feel even if I disagree with you. I am also not asking you to disavow the gang allegation, although I do think that you should do so.

Finally, the only reason that I am agreeing not to seek sanctions is because you explained to me that you were not in a position to control what Tyrone did. I don't agree with you as a matter of law, but I am sympathetic to your career concerns. However, I cannot allow him to use you as a foil.

So, if this is OK with you, send it back to me and I will not seek sanctions

Dear Judd:

As we have discussed:

Tyrone Blackburn sent a letter to the Court on January 22, 2022 in which he stated:

"An example of [Mr. Burstein's] deplorable behavior stems from his sick obsession with Mr. Gordon's wife. Mr. Burstein went scrummaging through the comments section of youtube posts in search of comments posted by Mrs. Gordon. Not only was his act of cyberstalking Mrs. Gordon creepy, but it was also weird, and beneath the dignity of this profession."

I write to confirm the following:

- 1. I did not see Mr. Blackburn's letter before he sent it;
- 2. I would have objected to these comment if I had seen the letter before it was sent (although I had no control over anything which Mr. Blackburn filed with the Court);
- 3. I do not in any way agree with them; and
- 4. I never at any time said anything to Mr. Blackburn even to suggest that I agreed the views he expressed in his letter;

As we have also discussed, I was not lead counsel in the case against Ms. Maraj and I had no control whatsoever over the filings submitted by Mr. Blackburn.

I appreciate the fact that you and your client have accepted my explanations as set forth above and have acknowledged that, in my role as Mr. Blackburn's co-counsel, I never acted in bad faith and that I had a good faith belief in the truth of Ms. Hough's factual allegations.

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Steven Gordon <sg@nytlaw.com>

Judd Burstein

From:

Sent: To: Subject:	Friday, January 28, 2022 1:14 PM Judd Burstein Re: FOR SETTLEMENT PURPOSES ONLY
<i>Jubjecu</i>	Ne. 1 on SETTLEMENT FOR OSES ONE
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Telephone: (212) 337-9770 Facsimile: (212) 337-3375 Email: sq@nytlaw.com

From: Judd Burstein

Sent: Friday, January 28, 2022 1:23 PM

To: Steven Gordon

Subject: RE: FOR SETTLEMENT PURPOSES ONLY

Tagree. But better him than me!!

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From: Steven Gordon <sg@nytlaw.com>
Sent: Friday, January 28, 2022 1:14 PM
To: Judd Burstein <jburstein@burlaw.com>
Subject: Re: FOR SETTLEMENT PURPOSES ONLY

Thank you, Judd. I will send under a separate email. Please note that due to my imploring, Tyrone has corrected his declaration to say "Upon information and belief."

As you may expect, Tyrone is going to come after me once I send this email. I am already facing threats.

On Fri, Jan 28, 2022 at 1:06 PM Judd Burstein < jburstein@burlaw.com> wrote:

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 11 of 118 PageID #: 1837

Finally, the only reason that I am agreeing not to seek sanctions is because you explained to
me that you were not in a position to control what Tyrone did. I don't agree with you as a
matter of law, but I am sympathetic to your career concerns. However, I cannot allow him to use you as a foil.

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views he expressed in his letter;

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 12 of 118 PageID #: 1838

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New York, NY 10013

Telephone: (212) 337-9770 Facsimile: (212) 337-3375 Email: sg@nytlaw.com

From: Judd Burstein

Sent: Friday, January 28, 2022 1:25 PM

To: Steven Gordon

Subject: RE: FOR SETTLEMENT PURPOSES ONLY

I am glad we could resolve this. I never wanted to hurt you. In light of you doing this, you can always reach out to me if you have a question on judgment

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Subject: Re: FOR SETTLEMENT PURPOSES ONLY

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 14 of 118 PageID #: 1840

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 15 of 118 PageID #: 1841

As we have also discussed, I was not lead counsel in the case against Ms. Maraj and I had no control whatsoever over the filings submitted by Mr. Blackburn.

I appreciate the fact that you and your client have accepted my explanations as set forth above and have acknowledged that, in my role as Mr. Blackburn's co-counsel, I never acted in bad faith and that I had a good faith belief in the truth of Ms. Hough's factual allegations.

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New York, NY 10013

Telephone: (212) 337-9770 Facsimile: (212) 337-3375 Email: sg@nytlaw.com

From: Steven Gordon <sg@nytlaw.com>
Sent: Steven Gordon <sg@nytlaw.com>
Friday, January 28, 2022 1:30 PM

To: Judd Burstein

Subject: Re: FOR SETTLEMENT PURPOSES ONLY

Thank you, Judd. I appreciate it. I am simply waiting for my boss's approval but it is completely reasonable and I appreciate it.

On Fri, Jan 28, 2022 at 1:24 PM Judd Burstein < jburstein@burlaw.com> wrote:

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To: Judd Burstein <jburstein@burlaw.com>
Subject: Re: FOR SETTLEMENT PURPOSES ONLY

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 17 of 118 PageID #: 1843

Thank you, Judd. I will send under a separate email. Please note that due to my imploring, Tyrone has corrected his declaration to say "Upon information and belief."
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So, if this is OK with you, send it back to me and I will not seek sanctions
Dear Judd:
As we have discussed:
Tyrone Blackburn sent a letter to the Court on January 22, 2022 in which he stated:

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 18 of 118 PageID #: 1844

"An example of [Mr. Burstein's] deplorable behavior stems from his sick obsession with Mr. Gordon's wife. Mr. Burstein went scrummaging through the comments section of youtube posts in search of comments posted by Mrs. Gordon. Not only was his act of cyberstalking Mrs. Gordon creepy, but it was also weird, and beneath the dignity of this profession."

I write to confirm the following:

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Telephone: (212) 337-9770 Facsimile: (212) 337-3375 Email: sg@nytlaw.com

From: Judd Burstein

Sent: Friday, January 28, 2022 1:31 PM

To: Steven Gordon

Subject: RE: FOR SETTLEMENT PURPOSES ONLY

OK. The sooner the better because I have to revise my motion

Judd Burstein
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I am glad we could resolve this. I never wanted to hurt you. In light of you doing this, you can always reach out to me if you have a question on judgment

Judd Burstein

Judd Burstein, P.C.

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15th Floor

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 21 of 118 PageID #: 1847

New York, New York 10016	1847
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Steven:

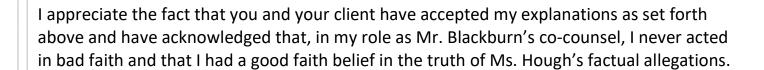
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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 22 of 118 PageID #: 1848

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 24 of 118 PageID #: 1850

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From: Steven Gordon < sg@nytlaw.com > Sent: Friday, January 28, 2022 1:30 PM

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 27 of 118 PageID #: 1853

To: Judd Burstein < <u>iburstein@burlaw.com</u>> **Subject:** Re: FOR SETTLEMENT PURPOSES ONLY

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To: Judd Burstein <jburstein@burlaw.com>
Subject: Re: FOR SETTLEMENT PURPOSES ONLY

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 28 of 118 PageID #: 1854

Thank you, Judd. I will send under a separate email. Please note that due to my imploring, Tyrone has corrected his

declaration to say "Upon information and belief."
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On Fri, Jan 28, 2022 at 1:06 PM Judd Burstein < <u>iburstein@burlaw.com</u> > wrote:
Steven:
I think this is fair. I am not asking you to say anything that you would not say in response to my sanctions motion. Nor am I asking you to agree that my email about your wife was appropriate because I understand how you feel even if I disagree with you. I am also not asking you to disavow the gang allegation, although I do think that you should do so.
Finally, the only reason that I am agreeing not to seek sanctions is because you explained to me that you were not in a position to control what Tyrone did. I don't agree with you as a matter of law, but I am sympathetic to your career concerns. However, I cannot allow him to use you as a foil.
So, if this is OK with you, send it back to me and I will not seek sanctions
Dear Judd:
As we have discussed:
Tyrone Blackburn sent a letter to the Court on January 22, 2022 in which he stated:

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 29 of 118 PageID #: 1855

"An example of [Mr. Burstein's] deplorable behavior stems from his sick obsession with Mr. Gordon's wife. Mr. Burstein went scrummaging through the comments section of youtube posts in search of comments posted by Mrs. Gordon. Not only was his act of cyberstalking Mrs. Gordon creepy, but it was also weird, and beneath the dignity of this profession."

I write to confirm the following:

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I appreciate the fact that you and your client have accepted my explanations as set forth above and have acknowledged that, in my role as Mr. Blackburn's co-counsel, I never acted in bad faith and that I had a good faith belief in the truth of Ms. Hough's factual allegations.

Judd Burstein

Judd Burstein, P.C.

260 Madison Avenue

15th Floor

New York, New York 10016

(212) 974-2400

(212) 974-2944 (Fax)

MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER – PARTICULARLY WHEN I AM DRAFTING AN EMAIL UNDER TIME PRESSURE

--

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Facsimile: (212) 337-3375

Email: sq@nytlaw.com

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 31 of 118 PageID #: 1857

Facsimile: (212) 337-3375

Email: sg@nytlaw.com

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Telephone: (212) 337-9770 Facsimile: (212) 337-3375 Email: sg@nytlaw.com

From: Steven Gordon <sg@nytlaw.com>
Sent: Steven Gordon <sg@nytlaw.com>
Friday, January 28, 2022 2:01 PM

To: Judd Burstein

Subject: Re: FOR SETTLEMENT PURPOSES ONLY

I just sent back to you with language approved by my boss.

On Fri, Jan 28, 2022 at 1:31 PM Judd Burstein < jburstein@burlaw.com> wrote:

OK. The sooner the better because I have to revise my motion

Judd Burstein

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I am glad we could resolve this. I never wanted to hurt you. In light of you doing this, you can always reach out to me if you have a question on judgment

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 34 of 118 PageID #: 1860

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 37 of 118 PageID #: 1863

Steven N. Gordon, Esq. Tsyngauz & Associates, P.C. 114 Mulberry Street, Ground Floor New York, NY 10013

Telephone: (212) 337-9770 Facsimile: (212) 337-3375 Email: sq@nytlaw.com

Judd Burstein

From: Judd Burstein Sent: Friday, January 28, 2022 2:02 PM To: Steven Gordon Subject: RE: FOR SETTLEMENT PURPOSES ONLY Great. Thanks. Let's keep this under wraps until Monday. Judd Burstein Judd Burstein, P.C. 260 Madison Avenue 15th Floor New York, New York 10016 (212) 974-2400 (212) 974-2944 (Fax) MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER – PARTICULARLY WHEN I AM DRAFTING AN **EMAIL UNDER TIME PRESSURE** From: Steven Gordon <sg@nytlaw.com> **Sent:** Friday, January 28, 2022 1:59 PM To: Judd Burstein < jburstein@burlaw.com> Subject: Re: FOR SETTLEMENT PURPOSES ONLY Dear Judd: As we have discussed: Tyrone Blackburn sent a letter to the Court on January 22, 2022 in which he stated:

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Respectfully,

Steven

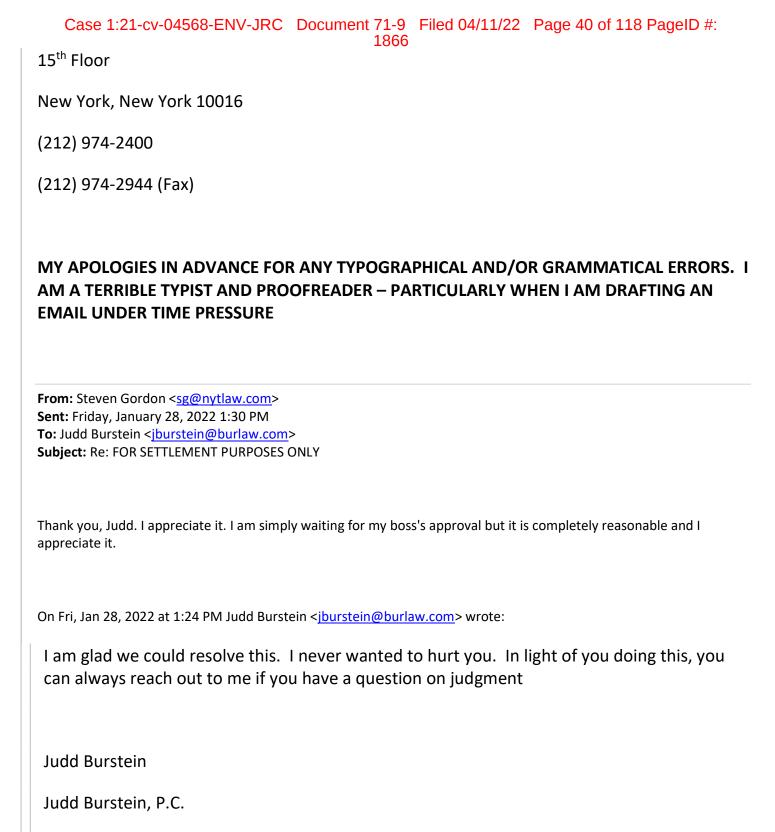
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Judd Burstein

Judd Burstein, P.C.

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 41 of 118 PageID #: 1867

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Sent: Friday, January 28, 2022 1:14 PM
To: Judd Burstein <<u>jburstein@burlaw.com</u>>
Subject: Re: FOR SETTLEMENT PURPOSES ONLY

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Finally, the only reason that I am agreeing not to seek sanctions is because you explained to me that you were not in a position to control what Tyrone did. I don't agree with you as a matter of law, but I am sympathetic to your career concerns. However, I cannot allow him to use you as a foil.

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 42 of 118 PageID #: 1868

So, if this is OK with you, send it back to me and I will not seek sanctions
Dear Judd:
As we have discussed:
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Judd Burstein

From: Judd Burstein

Sent: Friday, January 28, 2022 2:13 PM

To: Steven Gordon

Subject: RE: FOR SETTLEMENT PURPOSES ONLY

Good point. And I have no problem saying that you assiduously refused to say anything bad about him.

Judd Burstein
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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 47 of 118 PageID #: 1873

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 49 of 118 PageID #: 1875

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 53 of 118 PageID #: 1879

Facsimile: (212) 337-3375 Email: sg@nytlaw.com

Judd Burstein

From: Steven Gordon <sg@nytlaw.com>
Sent: Steven Gordon <sg@nytlaw.com>

To: Judd Burstein

Subject: Re: FOR SETTLEMENT PURPOSES ONLY

Thank you, Judd. And I honestly haven't said anything bad about him. I don't say anything bad about anyone. Starting to understand how you can become jaded in this profession.

On Fri, Jan 28, 2022 at 2:12 PM Judd Burstein < jburstein@burlaw.com> wrote:

Good point. And I have no problem saying that you assiduously refused to say anything bad about him.

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 55 of 118 PageID #: 1881

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I appreciate the fact that you and your client have accepted my explanations as set forth above and have acknowledged that, in my role as Mr. Blackburn's co-counsel, I never acted in bad faith and that I had a good faith belief in the truth of Ms. Hough's factual allegations.

Respectfully,

c_{\perp}	۰.		
` I	e١	$^{\prime}$	r١
J		_	

On Fri, Jan 28, 2022 at 1:31 PM Judd Burstein < jburstein@burlaw.com> wrote:

OK. The sooner the better because I have to revise my motion

Judd Burstein

Judd Burstein, P.C.

260 Madison Avenue

15th Floor

New York, New York 10016

(212) 974-2400

(212) 974-2944 (Fax)

MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER – PARTICULARLY WHEN I AM DRAFTING AN EMAIL UNDER TIME PRESSURE

From: Steven Gordon <sg@nytlaw.com>
Sent: Friday, January 28, 2022 1:30 PM
To: Judd Burstein <jburstein@burlaw.com>
Subject: Re: FOR SETTLEMENT PURPOSES ONLY

Thank you, Judd. I appreciate it. I am simply waiting for my boss's approval but it is completely reasonable and I appreciate it.

On Fri, Jan 28, 2022 at 1:24 PM Judd Burstein < jburstein@burlaw.com > wrote:

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 58 of 118 PageID #: 1884

I am glad we could resolve this.	I never wanted to hurt you.	In light of you doing this, you
can always reach out to me if yo	ou have a question on judgm	ent

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To: Judd Burstein <jburstein@burlaw.com>
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As you may expect, Tyrone is going to come after me once I send this email. I am already facing threats.

On Fri, Jan 28, 2022 at 1:06 PM Judd Burstein < jburstein@burlaw.com> wrote:

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I think this is fair. I am not asking you to say anything that you would not say in response to my sanctions motion. Nor am I asking you to agree that my email about your wife was appropriate because I understand how you feel even if I disagree with you. I am also not asking you to disavow the gang allegation, although I do think that you should do so.
Finally, the only reason that I am agreeing not to seek sanctions is because you explained to me that you were not in a position to control what Tyrone did. I don't agree with you as a matter of law, but I am sympathetic to your career concerns. However, I cannot allow him to use you as a foil.
So, if this is OK with you, send it back to me and I will not seek sanctions
Dear Judd:
As we have discussed:
Tyrone Blackburn sent a letter to the Court on January 22, 2022 in which he stated:
"An example of [Mr. Burstein's] deplorable behavior stems from his sick obsession with Mr. Gordon's wife. Mr. Burstein went scrummaging through the comments section of youtube posts in search of comments posted by Mrs. Gordon. Not only was his act of cyberstalking Mrs. Gordon creepy, but it was also weird, and beneath the dignity of this profession."
I write to confirm the following:

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 60 of 118 PageID #: 1886

- 1. I did not see Mr. Blackburn's letter before he sent it;
- 2. I would have objected to these comment if I had seen the letter before it was sent (although I had no control over anything which Mr. Blackburn filed with the Court);
- 3. I do not in any way agree with them; and
- 4. I never at any time said anything to Mr. Blackburn even to suggest that I agreed the views he expressed in his letter;

As we have also discussed, I was not lead counsel in the case against Ms. Maraj and I had no control whatsoever over the filings submitted by Mr. Blackburn.

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--

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 62 of 118 PageID #: 1888

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Telephone: (212) 337-9770 Facsimile: (212) 337-3375 Email: sg@nytlaw.com

Judd Burstein

From: Judd Burstein

Sent: Friday, January 28, 2022 2:32 PM

To: Steven Gordon

Subject: RE: FOR SETTLEMENT PURPOSES ONLY

I am sending the letter out on scheduling which will make clear that I am not seeking sanctions on you. It will not reveal anything else

Judd Burstein
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From: Steven Gordon <sg@nytlaw.com>
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To: Judd Burstein <jburstein@burlaw.com>
Subject: Re: FOR SETTLEMENT PURPOSES ONLY

Sounds good. I believe that Mr. Blackburn is going to argue that we have had several conversations behind his back, during which I talked bad about him. This is demonstrably untrue, but as it related to both of us, I am making you aware. I do not represent Plaintiff any longer. I only represent myself, now.

On Fri, Jan 28, 2022 at 2:02 PM Judd Burstein < jburstein@burlaw.com> wrote:

Great. Thanks. Let's keep this under wraps until Monday.

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From: Steven Gordon < sg@nytlaw.com > Sent: Friday, January 28, 2022 1:59 PM To: Judd Burstein < jburstein@burlaw.com > Subject: Re: FOR SETTLEMENT PURPOSES ONLY
Dear Judd:
As we have discussed:
Tyrone Blackburn sent a letter to the Court on January 22, 2022 in which he stated:
"An example of [Mr. Burstein's] deplorable behavior stems from his sick obsession with Mr. Gordon's wife. Mr. Burstein went scrummaging through the comments section of youtube posts in search of comments posted by Mrs. Gordon. Not only was his act of cyberstalking Mrs. Gordon creepy, but it was also weird, and beneath the dignity of this profession."
I write to confirm the following:
1 did not see Mr. Blackburn's letter before he sent it:

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 66 of 118 PageID #: 1892

- 2. I would have objected to these comment if I had seen the letter before it was sent (although I had no control over anything which Mr. Blackburn ultimately filed with the Court);
- 3. I do not in any way agree with them; and
- 4. I never at any time said anything to Mr. Blackburn even to suggest that I agreed the views he expressed in his letter;

As we have also discussed, I was not lead counsel in the case against Ms. Maraj and I had no control over statements of facts ultimately submitted in Mr. Blackburn's filings.

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Steven

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 68 of 118 PageID #: 1894

MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER – PARTICULARLY WHEN I AM DRAFTING AN EMAIL UNDER TIME PRESSURE

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So, if this is OK with you, send it back to me and I will not seek sanctions

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Steven N. Gordon, Esq. Tsyngauz & Associates, P.C. 114 Mulberry Street, Ground Floor New York, NY 10013 Telephone: (212) 337-9770 Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 72 of 118 PageID #: 1898

Facsimile: (212) 337-3375 Email: sg@nytlaw.com

From: Judd Burstein

Sent: Friday, January 28, 2022 2:44 PM

To: Steven Gordon

Subject: RE: FOR SETTLEMENT PURPOSES ONLY

Can you please send me back your email without the FOR SETTLEMENT PURPOSES" subject line.

Also ,in par. 2, there is an "s" missing after "comment."

Thanks

Judd Burstein
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260 Madison Avenue
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(212) 974-2400
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From: Steven Gordon <sg@nytlaw.com>
Sent: Friday, January 28, 2022 1:30 PM
To: Judd Burstein <jburstein@burlaw.com>
Subject: Re: FOR SETTLEMENT PURPOSES ONLY

Thank you, Judd. I appreciate it. I am simply waiting for my boss's approval but it is completely reasonable and I appreciate it.

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I am glad we could resolve this. I never wanted to hurt you. In light of you doing this, you can always reach out to me if you have a question on judgment

Judd Burstein

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 74 of 118 PageID #: 1900

Judd Burstein, P.C.

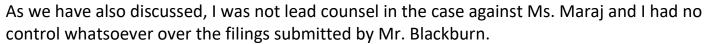
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73

I

Finally, the only reason that I am agreeing not to seek sanctions is because you explained to me that you were not in a position to control what Tyrone did. I don't agree with you as a matter of law, but I am sympathetic to your career concerns. However, I cannot allow him to use you as a foil.
So, if this is OK with you, send it back to me and I will not seek sanctions
Dear Judd:
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- 3.I do not in any way agree with them; and
- 4.I never at any time said anything to Mr. Blackburn even to suggest that I agreed the views he expressed in his letter;

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 76 of 118 PageID #: 1902



I appreciate the fact that you and your client have accepted my explanations as set forth above and have acknowledged that, in my role as Mr. Blackburn's co-counsel, I never acted in bad faith and that I had a good faith belief in the truth of Ms. Hough's factual allegations.

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Steven N. Gordon, Esq.

Tsyngauz & Associates, P.C.

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 77 of 118 PageID #: 1903

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Telephone: (212) 337-9770 Facsimile: (212) 337-3375 Email: sg@nytlaw.com

From: Steven Gordon <sg@nytlaw.com>
Sent: Steven Gordon <sg@nytlaw.com>
Friday, January 28, 2022 2:46 PM

To: Judd Burstein

Subject: Re: FOR SETTLEMENT PURPOSES ONLY

Thank you. If you cannot answer this question, do not worry about it and I will ask someone else. At the hearing on Monday, the Judge simply wants to confirm that the client terminated me and which type of lien I am seeking, correct? It is my understanding that the purported reasons are irrelevant, as a client can terminate counsel for any or no reason at all. This is not me insinuating that I did anything wrong -- candidly, I think that I'm being extorted to not seek a lien by threats of asserting untrue reasons for my termination. I'm only asking you because my boss is unsure and I'm sure you've been to one of these in your 40 years.

On Fri, Jan 28, 2022 at 2:31 PM Judd Burstein < jburstein@burlaw.com> wrote:

I am sending the letter out on scheduling which will make clear that I am not seeking sanctions on you. It will not reveal anything else

Judd Burstein

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From: Steven Gordon < sg@nytlaw.com > Sent: Friday, January 28, 2022 2:12 PM

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 79 of 118 PageID #: 1905

To: Judd Burstein < <u>iburstein@burlaw.com</u>> **Subject:** Re: FOR SETTLEMENT PURPOSES ONLY

Sounds good. I believe that Mr. Blackburn is going to argue that we have had several conversations behind his back, during which I talked bad about him. This is demonstrably untrue, but as it related to both of us, I am making you aware. I do not represent Plaintiff any longer. I only represent myself, now.

On Fri, Jan 28, 2022 at 2:02 PM Judd Burstein < jburstein@burlaw.com> wrote:

Great. Thanks. Let's keep this under wraps until Monday.

Judd Burstein

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From: Steven Gordon <sg@nytlaw.com>
Sent: Friday, January 28, 2022 1:59 PM
To: Judd Burstein <jburstein@burlaw.com>
Subject: Re: FOR SETTLEMENT PURPOSES ONLY

Dear Judd:

As we have discussed:		
Tyrone Blackburn sent a letter to the Court on January 22, 2022 in which he stated:		
"An example of [Mr. Burstein's] deplorable behavior stems from his sick obsession with Mr. Gordon's wife. Mr. Burstein went scrummaging through the comments section of youtube posts in search of comments posted by Mrs. Gordon. Not only was his act of cyberstalking Mrs. Gordon creepy, but it was also weird, and beneath the dignity of this profession."		
I write to confirm the following:		
1. I did not see Mr. Blackburn's letter before he sent it;		
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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 81 of 118 PageID #: Respectfully, Steven On Fri, Jan 28, 2022 at 1:31 PM Judd Burstein < jburstein@burlaw.com> wrote: OK. The sooner the better because I have to revise my motion Judd Burstein Judd Burstein, P.C. 260 Madison Avenue 15th Floor New York, New York 10016 (212) 974-2400 (212) 974-2944 (Fax) MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER - PARTICULARLY WHEN I AM DRAFTING AN EMAIL UNDER TIME PRESSURE

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 82 of 118 PageID #: 1908

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(212) 974-2400

(212) 974-2944 (Fax)

MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER – PARTICULARLY WHEN I AM DRAFTING AN EMAIL UNDER TIME PRESSURE

Steven N. Gordon, Esq.

Tsyngauz & Associates, P.C.

114 Mulberry Street, Ground Floor

New York, NY 10013

Telephone: (212) 337-9770

Facsimile: (212) 337-3375

Email: sg@nytlaw.com

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Telephone: (212) 337-9770

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 87 of 118 PageID #: 1913

Facsimile: (212) 337-3375 Email: sg@nytlaw.com

From: Judd Burstein

Sent: Friday, January 28, 2022 2:48 PM

To: Steven Gordon

Subject: RE: FOR SETTLEMENT PURPOSES ONLY

Correct. You are still supporting her facts. It would be a charging lien.

Judd Burstein
Judd Burstein, P.C.
260 Madison Avenue
15th Floor
New York, New York 10016
(212) 974-2400
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From: Steven Gordon <sg@nytlaw.com>
Sent: Friday, January 28, 2022 2:46 PM
To: Judd Burstein <jburstein@burlaw.com>
Subject: Re: FOR SETTLEMENT PURPOSES ONLY

Thank you. If you cannot answer this question, do not worry about it and I will ask someone else. At the hearing on Monday, the Judge simply wants to confirm that the client terminated me and which type of lien I am seeking, correct? It is my understanding that the purported reasons are irrelevant, as a client can terminate counsel for any or no reason at all. This is not me insinuating that I did anything wrong -- candidly, I think that I'm being extorted to not seek a lien by threats of asserting untrue reasons for my termination. I'm only asking you because my boss is unsure and I'm sure you've been to one of these in your 40 years.

On Fri, Jan 28, 2022 at 2:31 PM Judd Burstein < jburstein@burlaw.com> wrote:

I am sending the letter out on scheduling which will make clear that I am not seeking sanctions on you. It will not reveal anything else

Judd Burstein

Judd Burstein, P.C.

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 89 of 118 PageID #: 1915

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From: Steven Gordon <sg@nytlaw.com> Sent: Friday, January 28, 2022 2:12 PM To: Judd Burstein <jburstein@burlaw.com> Subject: Re: FOR SETTLEMENT PURPOSES ONLY</jburstein@burlaw.com></sg@nytlaw.com>
Sounds good. I believe that Mr. Blackburn is going to argue that we have had several conversations behind his back, during which I talked bad about him. This is demonstrably untrue, but as it related to both of us, I am making you aware. I do not represent Plaintiff any longer. I only represent myself, now.
On Fri, Jan 28, 2022 at 2:02 PM Judd Burstein < <u>jburstein@burlaw.com</u> > wrote:
Great. Thanks. Let's keep this under wraps until Monday.
Judd Burstein
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MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER – PARTICULARLY WHEN I AM DRAFTING AN EMAIL UNDER TIME PRESSURE

From: Steven Gordon < sg@nytlaw.com > Sent: Friday, January 28, 2022 1:59 PM To: Judd Burstein < jburstein@burlaw.com > Subject: Re: FOR SETTLEMENT PURPOSES ONLY
Dear Judd:
As we have discussed:
Tyrone Blackburn sent a letter to the Court on January 22, 2022 in which he stated:
"An example of [Mr. Burstein's] deplorable behavior stems from his sick obsession with Mr. Gordon's wife. Mr. Burstein went scrummaging through the comments section of youtube posts in search of comments posted by Mrs. Gordon. Not only was his act of cyberstalking Mrs. Gordon creepy, but it was also weird, and beneath the dignity of this profession."
I write to confirm the following:

1. I did not see Mr. Blackburn's letter before he sent it;

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 91 of 118 PageID #: 1917

- 2. I would have objected to these comment if I had seen the letter before it was sent (although I had no control over anything which Mr. Blackburn ultimately filed with the Court);
- 3. I do not in any way agree with them; and
- 4. I never at any time said anything to Mr. Blackburn even to suggest that I agreed the views he expressed in his letter;

As we have also discussed, I was not lead counsel in the case against Ms. Maraj and I had no control over statements of facts ultimately submitted in Mr. Blackburn's filings.

I appreciate the fact that you and your client have accepted my explanations as set forth above and have acknowledged that, in my role as Mr. Blackburn's co-counsel, I never acted in bad faith and that I had a good faith belief in the truth of Ms. Hough's factual allegations.

Respectfully,

Steven

On Fri, Jan 28, 2022 at 1:31 PM Judd Burstein < jburstein@burlaw.com> wrote:

OK. The sooner the better because I have to revise my motion

Judd Burstein

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To: Judd Burstein <<u>jburstein@burlaw.com</u>>
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Thank you, Judd. I appreciate it. I am simply waiting for my boss's approval but it is completely reasonable and I appreciate it.

On Fri, Jan 28, 2022 at 1:24 PM Judd Burstein < jburstein@burlaw.com> wrote:

I am glad we could resolve this. I never wanted to hurt you. In light of you doing this, you can always reach out to me if you have a question on judgment

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 93 of 118 PageID #: 1919

MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER – PARTICULARLY WHEN I AM DRAFTING AN EMAIL UNDER TIME PRESSURE

From: Steven Gordon <sg@nytlaw.com> Sent: Friday, January 28, 2022 1:14 PM To: Judd Burstein <jburstein@burlaw.com> Subject: Re: FOR SETTLEMENT PURPOSES ONLY</jburstein@burlaw.com></sg@nytlaw.com>
Thank you, Judd. I will send under a separate email. Please note that due to my imploring, Tyrone has corrected his declaration to say "Upon information and belief."
As you may expect, Tyrone is going to come after me once I send this email. I am already facing threats.
On Fri, Jan 28, 2022 at 1:06 PM Judd Burstein < <u>jburstein@burlaw.com</u> > wrote:
Steven:
I think this is fair. I am not asking you to say anything that you would not say in respons to my sanctions motion. Nor am I asking you to agree that my email about your wife was appropriate because I understand how you feel even if I disagree with you. I am also not asking you to disavow the gang allegation, although I do think that you should do so.
Finally, the only reason that I am agreeing not to seek sanctions is because you explained to me that you were not in a position to control what Tyrone did. I don't agree with you as a matter of law, but I am sympathetic to your career concerns. However, I cannot allow him to use you as a foil.

So, if this is OK with you, send it back to me and I will not seek sanctions

I appreciate the fact that you and your client have accepted my explanations as set forth above and have acknowledged that, in my role as Mr. Blackburn's co-counsel, I never acted in bad faith and that I had a good faith belief in the truth of Ms. Hough's factual allegations.

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 97 of 118 PageID #: 1923

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New York, NY 10013

Telephone: (212) 337-9770 Facsimile: (212) 337-3375 Email: sg@nytlaw.com

From: Judd Burstein Sent: Friday, January 28, 2022 2:49 PM To: Steven Gordon Subject: RE: Hough v. Petty et al. I would shut my phone off for the weekend Judd Burstein Judd Burstein, P.C. 260 Madison Avenue 15th Floor New York, New York 10016 (212) 974-2400 (212) 974-2944 (Fax) MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER – PARTICULARLY WHEN I AM DRAFTING AN **EMAIL UNDER TIME PRESSURE** From: Steven Gordon <sg@nytlaw.com> **Sent:** Friday, January 28, 2022 2:48 PM To: Judd Burstein < jburstein@burlaw.com> Subject: Hough v. Petty et al. Dear Judd: As we have discussed:

"An example of [Mr. Burstein's] deplorable behavior stems from his sick obsession with Mr. Gordon's wife. Mr. Burstein went scrummaging through the comments section of youtube posts in search of comments posted by Mrs. Gordon. Not only was his act of cyberstalking Mrs. Gordon creepy, but it was also weird, and beneath the dignity of this profession."

Tyrone Blackburn sent a letter to the Court on January 22, 2022 in which he stated:

I write to confirm the following:

- 1. I did not see Mr. Blackburn's letter before he sent it;
- 2. I would have objected to these comments if I had seen the letter before it was sent (although I had no control over anything which Mr. Blackburn ultimately filed with the Court);
- 3. I do not in any way agree with them; and
- 4. I never at any time said anything to Mr. Blackburn even to suggest that I agreed with the views as expressed in his letter;

As we have also discussed, I was not lead counsel in the case against Ms. Maraj and I had no control over statements of facts ultimately submitted in Mr. Blackburn's filings.

I appreciate the fact that you and your client have accepted my explanations as set forth above and have acknowledged that, in my role as Mr. Blackburn's co-counsel, I never acted in bad faith and that I had a good faith belief in the truth of Ms. Hough's factual allegations.

Respectfully,

Steven

--

Steven N. Gordon, Esq. Tsyngauz & Associates, P.C. 114 Mulberry Street, Ground Floor New York, NY 10013

Telephone: (212) 337-9770 Facsimile: (212) 337-3375 Email: sq@nytlaw.com

Steven Gordon <sg@nytlaw.com> From: Friday, January 28, 2022 2:48 PM Sent: To: Judd Burstein Subject: Hough v. Petty et al. Dear Judd: As we have discussed: Tyrone Blackburn sent a letter to the Court on January 22, 2022 in which he stated: "An example of [Mr. Burstein's] deplorable behavior stems from his sick obsession with Mr. Gordon's wife. Mr. Burstein went scrummaging through the comments section of youtube posts in search of comments posted by Mrs. Gordon. Not only was his act of cyberstalking Mrs. Gordon creepy, but it was also weird, and beneath the dignity of this profession." I write to confirm the following:

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 101 of 118 PageID #: 1927

I appreciate the fact that you and your client have accepted my explanations as set forth above and have acknowledged that, in my role as Mr. Blackburn's co-counsel, I never acted in bad faith and that I had a good faith belief in the truth of Ms. Hough's factual allegations.

Respectfully,

Steven

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Telephone: (212) 337-9770 Facsimile: (212) 337-3375 Email: sq@nytlaw.com

From: Steven Gordon <sg@nytlaw.com>
Sent: Steven Gordon <sg@nytlaw.com>
Friday, January 28, 2022 2:49 PM

To: Judd Burstein

Subject: Re: FOR SETTLEMENT PURPOSES ONLY

Ok, thank you.

On Fri, Jan 28, 2022 at 2:48 PM Judd Burstein < jburstein@burlaw.com> wrote:

Correct. You are still supporting her facts. It would be a charging lien.

Judd Burstein

Judd Burstein, P.C.

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To: Judd Burstein <jburstein@burlaw.com>
Subject: Re: FOR SETTLEMENT PURPOSES ONLY

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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 103 of 118 PageID #: 1929

It is my understanding that the purported reasons are irrelevant, as a client can terminate counsel for any or no reason at all. This is not me insinuating that I did anything wrong -- candidly, I think that I'm being extorted to not seek a lien by threats of asserting untrue reasons for my termination. I'm only asking you because my boss is unsure and I'm sure you've been to one of these in your 40 years.

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Sounds good. I believe that Mr. Blackburn is going to argue that we have had several conversations behind his back, during which I talked bad about him. This is demonstrably untrue, but as it related to both of us, I am making you aware. I do not represent Plaintiff any longer. I only represent myself, now.

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 104 of 118 PageID #: 1930

On Fri, Jan 28, 2022 at 2:02 PM Judd Burstein < <u>iburstein@burlaw.com</u> > wrote:		
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ludd Burstein		
ludd Burstein, P.C.		
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Respectfully,

Steven

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 106 of 118 PageID #: 1932

On Fri, Jan 28, 2022 at 1:31 PM Judd Burstein < jburstein@burlaw.com> wrote:

OK. The sooner the better because I have to revise my motion

Judd Burstein

Judd Burstein, P.C.

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I am glad we could resolve this. I never wanted to hurt you. In light of you doing this, you can always reach out to me if you have a question on judgment

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 107 of 118 PageID #: 1933

Judd Burstein, P.C.	
260 Madison Avenue	
15 th Floor	
New York, New York 10	16
(212) 974-2400	
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Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 108 of 118 PageID #: 1934

you. I am also not asking you to disavow the gang allegation, although I do think that you should do so.
Finally, the only reason that I am agreeing not to seek sanctions is because you explained to me that you were not in a position to control what Tyrone did. I don't agree with you as a matter of law, but I am sympathetic to your career concerns. However, I cannot allow him to use you as a foil.
So, if this is OK with you, send it back to me and I will not seek sanctions
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Court);

Case 1:21-cv-04568-ENV-JRC Document 71-9 Filed 04/11/22 Page 109 of 118 PageID #: 1935

- 3. I do not in any way agree with them; and
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I appreciate the fact that you and your client have accepted my explanations as set forth above and have acknowledged that, in my role as Mr. Blackburn's co-counsel, I never acted in bad faith and that I had a good faith belief in the truth of Ms. Hough's factual allegations.

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Steven N. Gordon, Esq.

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From: Sent: To: Subject:	Steven Gordon <sg@nytlaw.com> Friday, January 28, 2022 2:50 PM Judd Burstein Re: Hough v. Petty et al.</sg@nytlaw.com>
Good idea. Thanks.	
On Fri, Jan 28, 2022 at 2:4	49 PM Judd Burstein < <u>iburstein@burlaw.com</u> > wrote:
I would shut my ph	one off for the weekend
Judd Burstein	
Judd Burstein, P.C.	
260 Madison Avenu	ue
15 th Floor	
New York, New Yor	·k 10016
(212) 974-2400	
(212) 974-2944 (Fa	x)
	ADVANCE FOR ANY TYPOGRAPHICAL AND/OR GRAMMATICAL ERRORS. I PIST AND PROOFREADER – PARTICULARLY WHEN I AM DRAFTING AN E PRESSURE
From: Steven Gordon <s Sent: Friday, January 28, To: Judd Burstein <<u>jburs</u> Subject: Hough v. Petty</s 	, 2022 2:48 PM tein@burlaw.com>
Dear Judd:	

As we have discussed:		
Tyrone Blackburn sent a letter to the Court on January 22, 2022 in which he stated:		
"An example of [Mr. Burstein's] deplorable behavior stems from his sick obsession with Mr. Gordon's wife. Mr. Burstein went scrummaging through the comments section of youtube posts in search of comments posted by Mrs. Gordon. Not only was his act of cyberstalking Mrs. Gordon creepy, but it was also weird, and beneath the dignity of this profession."		
I write to confirm the following:		
1. did not see Mr. Blackburn's letter before he sent it;		
 I would have objected to these comments if I had seen the letter before it was sent (although I had no control over anything which Mr. Blackburn ultimately filed with the Court); 		
3. I do not in any way agree with them; and		
4. I never at any time said anything to Mr. Blackburn even to suggest that I agreed with the views as expressed in his letter;		
As we have also discussed, I was not lead counsel in the case against Ms. Maraj and I had no control over statements of facts ultimately submitted in Mr. Blackburn's filings.		
I appreciate the fact that you and your client have accepted my explanations as set forth		

Res	pe	ctf	ul	ly,

Steven

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Telephone: (212) 337-9770 Facsimile: (212) 337-3375 Email: sg@nytlaw.com

From: Judd Burstein

Sent: Friday, January 28, 2022 4:26 PM

To: Steven Gordon

Subject: RE: Preservation Notice

So preserve it. There is nothing for you to be concerned about. Our communications were entirely appropriate. He is just lashing out.

Judd Burstein
Judd Burstein, P.C.
260 Madison Avenue
15th Floor
New York, New York 10016
(212) 974-2400
(212) 974-2944 (Fax)

MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER – PARTICULARLY WHEN I AM DRAFTING AN EMAIL UNDER TIME PRESSURE

From: Steven Gordon <sg@nytlaw.com>
Sent: Friday, January 28, 2022 4:22 PM
To: Judd Burstein <jburstein@burlaw.com>

Subject: Fwd: Preservation Notice

FYI - I believe he thinks we had been communicating due to that one email which you were using as an exhibit.

----- Forwarded message -----

From: Tyrone Blackburn < tblackburn@tablackburnlaw.com >

Date: Fri, Jan 28, 2022 at 4:03 PM Subject: Preservation Notice

To: Steven Ciar's Husband < sg@nytlaw.com >

See attached.

Regards,

Tyrone A. Blackburn, Esq. T. A. Blackburn Law, PLLC. Phone: 347-342-7432 TABlackburnlaw.com

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Steven N. Gordon, Esq. Tsyngauz & Associates, P.C. 114 Mulberry Street, Ground Floor New York, NY 10013 Telephone: (212) 337-9770

Facsimile: (212) 337-3375 Email: sg@nytlaw.com

From: Steven Gordon <sg@nytlaw.com>
Sent: Steven Gordon <sg@nytlaw.com>
Friday, January 28, 2022 4:22 PM

To: Judd Burstein

Subject: Fwd: Preservation Notice

Attachments: Preservation Notice for Steven Gordon-1282022.pdf

FYI - I believe he thinks we had been communicating due to that one email which you were using as an exhibit.

----- Forwarded message ------

From: **Tyrone Blackburn** < <u>tblackburn@tablackburnlaw.com</u>>

Date: Fri, Jan 28, 2022 at 4:03 PM Subject: Preservation Notice

To: Steven Ciar's Husband < <sg@nytlaw.com >

See attached.

Regards,

Tyrone A. Blackburn, Esq. T. A. Blackburn Law, PLLC. Phone: 347-342-7432 TABlackburnlaw.com

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Steven N. Gordon, Esq. Tsyngauz & Associates, P.C. 114 Mulberry Street, Ground Floor

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